

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION

MICHAEL J. PAULING AND RAMONA  
CESAREO-PAULING,

Plaintiffs,

vs.

Case No. 7:19-CV-00206-HMH

IDELIVERTL, LLC; ISOM FREIGHT LINES, LLC;  
SAMMIE LEE MCCLOUD; NAVISTAR, INC.;  
NATIONAL FLEET MANAGEMENT, INC.;  
AND G&P TRUCKING COMPANY, INC.,  
Defendants.

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VIDEOTAPED VIDEOTELECONFERENCE

DEPOSITION OF: NATIONAL FLEET MANAGEMENT, INC.  
(By William D. Black)  
(Via Videoconference)

DATE: Monday, July 6, 2020

TIME: 1:10 p.m.

LOCATION: 818 Greenwood Avenue, NE  
#106  
Atlanta, Georgia 30306

TAKEN BY: Counsel for Plaintiffs

REPORTED BY: Elaine L. Grove-DeFreitas,  
Certified Court Reporter  
(Via Videoconference)

VIDEOTAPED BY: Douglas Browne, CLVS  
(Via Videoconference)

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1           A.    Is the valve would just push through the  
2 dash. The mounting screws are what actually hold it  
3 stable so you can push the valves in.

4           Q.    And what happens if the valve is pushed  
5 into the dash? Well, strike that.

6                    Is that true for both the valves, the  
7 red valve and the yellow valve?

8           A.    It's all one valve. Yeah. They come in  
9 one piece.

10          Q.    And what do you call -- the red valve is  
11 called what?

12          A.    That's your parking brake.

13          Q.    And the yellow diagonal-shaped one,  
14 diamond-shaped one?

15          A.    Your trailer -- trailer brakes.

16          Q.    Okay. And if there were screws missing  
17 in affixing the valves to the dash, what did you  
18 tell me would happen?

19          A.    It wouldn't work. You would push it in  
20 and it would just push through the dash.

21          Q.    And what would then -- how would that  
22 translate into either the brakes -- the air brakes  
23 operating or failing to operate?

24          A.    It would never -- you wouldn't be able  
25 to move the vehicle. The vehicle -- the parking